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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re the matter of

STACIE GARY,

Debtor.

NO. 15-33954

CHAPTER 13

JUDGE DONALD R. CASSLING

NOTICE OF MOTION

TO:

Stacie Gary
1834 Lemar Ave.
Evanston, IL 60201
BY U.S. MAIL

David H. Cutler, Attorney for Debtor
Tom Vaughn, Chapter 13 Trustee

BY ELECTRONIC TRANSMISSION
BY ELECTRONIC TRANSMISSION

PLEASE TAKE NOTICE that on October 31, 2019, at 9:30 a.m., or as soon thereafter as Counsel may be heard, we shall appear before the Honorable DONALD R. CASSLING, Bankruptcy Judge, at **219 South Dearborn Street, Courtroom #619, Chicago, Illinois**, and then and there present the attached Motion to Modify the Automatic Stay, a copy of which is hereby served upon you.

PROOF OF SERVICE

I, the undersigned attorney, certify that I served a copy of this Notice with Motion to Modify the Automatic Stay attached, upon the parties listed above, by the methods specified, from 2056 Ridge Road, Homewood, Illinois 60430 before the hour of 5:00 P.M. on the 21st day of October, 2019.

BY: /s/ Terri M. Long
TERRI M. LONG

LAW OFFICES OF TERRI M. LONG

2056 Ridge Road

Homewood, Illinois 60430

Phone: (708) 922-3301

Fax: : (708) 922-3302

Atty. for TOYOTA MOTOR CREDIT CORPORATION SERVICER FOR TOYOTA
LEASE TRUST, its Successors and/or Assigns

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MOTION TO MODIFY AUTOMATIC STAY

Now comes TOYOTA MOTOR CREDIT CORPORATION SERVICER FOR TOYOTA LEASE TRUST, its successors and/or assigns (hereinafter referred to as “Movant”), a creditor herein, by TERRI M. LONG, its attorney, and moves this Honorable Court for entry of an Order modifying the restraining provisions of §362 of the Bankruptcy Code, and in support thereof respectfully represents as follows:

1. On October 5, 2015, the Debtor herein filed a petition for relief under Chapter 13 of the Bankruptcy Code.

2. Movant is a creditor of the Debtor with respect to a certain Lease Agreement dated July 24, 2014, providing for the lease of a certain 2014 Toyota Venza motor vehicle.

3. The lease was assumed in Debtor’s confirmed plan.

4. The lease matured on July 24, 2019, but as of this date the Debtor has failed to return the vehicle to creditor, as required by the lease agreement.

5. Movant requests that Bankruptcy Rule 4001(a)(3) not apply to any Order granting this motion.

WHEREFORE, TOYOTA MOTOR CREDIT CORPORATION SERVICER FOR TOYOTA LEASE TRUST, its successors and/or assigns, prays that this Honorable Court enter an Order modifying the restraining provisions of §362 of the Bankruptcy Code to permit the said TOYOTA MOTOR CREDIT CORPORATION SERVICER FOR TOYOTA LEASE TRUST, its successors and/or assigns, to take possession of and sell a certain 2017 Toyota Venza motor vehicle, V.I.N. 4T3BA3BBXEU058710, and for such other and further relief as this Court may deem just.

TOYOTA MOTOR CREDIT
CORPORATION, its Successors and/or
Assigns

BY: /s/ Terri M. Long
TERRI M. LONG

LAW OFFICES OF TERRI M. LONG

2056 Ridge Road

Homewood, Illinois 60430

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LEASE TRUST, its Successors and/or Assigns